

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	<b><u>FILED EX PARTE AND UNDER SEAL</u></b>
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-12582-RCL
	)	
301 ADAMS STREET, QUINCY,	)	
MASSACHUSETTS; 1548-1558	)	
DORCHESTER AVENUE, DORCHESTER,	)	
MASSACHUSETTS; FIVE (5) CERTAIN	)	
PARCELS OF LAND WITH THE	)	
BUILDINGS(S) THEREON IN BROCKTON	)	
PLYMOUTH COUNTY, MASSACHUSETTS,	)	
COMMONLY KNOWN AS 11 ROSSETER	)	
STREET, 16 ROSSETER STREET,	)	
213-223 NORTH MAIN STREET, 204	)	
NORTH MONTELLO STREET, AND 227	)	
NORTH MAIN STREET, INCLUDING ALL	)	
APPURTENANCES AND IMPROVEMENTS	)	
THEREON; \$67,561.88 IN UNITED	)	
STATES CURRENCY; and \$26,776.42 IN	)	
UNITED STATES CURRENCY, SEIZED	)	
FROM ASIAN AMERICAN BANK CHECKING	)	
ACCOUNT NUMBER 310029269,	)	
Defendants.	)	

**WARRANT AND MONITION**

To: The United States Marshal for the District of  
Massachusetts, or his Deputies

We Command You that you give notice to all persons concerned  
that an Amended Verified Complaint for Forfeiture In Rem (the  
"Complaint"), a copy of which is attached hereto, has been filed  
by the United States of America against the defendant properties,  
which are described as:

- a. the real property and buildings located at 301 Adams  
Street, Quincy, Massachusetts, having a deed recorded  
at the Norfolk County Land Court as Document No.  
1025853, noted on Certificate of Title No. 167544 ("301  
Adams"), currently owned by Tina Le;
- b. the real property and buildings located at 1548-1558

09

Dorchester Avenue, Dorchester, Massachusetts, having a deed recorded at the Suffolk County Registry of Deeds at Book 32823, Page 262, ("1548 Dorchester"), currently owned by Tina Le;

- c. five (5) certain parcels of land with the buildings(s) thereon in Brockton, Plymouth County, Massachusetts, commonly known as 11 Rosseter Street, 16 Rosseter Street, 213-223 North Main Street, 204 North Montello Street, and 227 North Main Street, having a deed recorded at the Plymouth County Registry of Deeds, Book 29342, Page 298), ("204 North Montello"), currently owned by DL Group, L.L.C.;
- d. \$67,561.88 in United States Currency<sup>1</sup>, seized from 301 Adams on December 15, 2004 (the "Seized Currency"); and
- e. \$26,776.42 in United States Currency, seized from Asian American Bank Checking Account Number 310029269, held in the name of Tina Le, on December 15, 2004 (the "9269 Account"),

(collectively referred to as the "Defendant Properties"), more particularly described in the Complaint for the forfeiture of the Defendant Properties to the United States of America pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 981(a)(1)(A), and 981 (b), and Title 31, United States Code, Section 5317(c)(1) and (c)(2).

Accordingly, you are hereby directed to serve, and give notice of, the Complaint by:

- (1) Publishing notice of the United States' intent to forfeit the Defendant Properties at least once for three (3) successive weeks in the Boston Herald or any other newspaper having a general circulation in this District;

---

<sup>1</sup>The currency seized from 301 Adams included United States Currency, Canadian Currency, Singapore Currency, and Euros. All of the seized currency was converted into United States Currency at the applicable exchange rate, and totaled \$67,561.88.

- (2) Serving the Defendant Properties by posting a copy of this Warrant and Monition and the Complaint upon each of the Defendant Properties; and
- (3) Mailing a copy of this Warrant and Monition, together with a copy of the Complaint to:

Tina Le  
301 Adams Street  
Quincy, MA 02169

Steven Nguyen  
301 Adams Street  
Quincy, MA 02169

Plymouth County Registry of Deeds  
7 Russell Street  
Plymouth, MA 02361

DL Group L.L.C.  
204 North Montello Street  
Brockton, MA 02301

Steven A. Rubin  
Trustee of the SA Rubin  
Realty Trust  
11 Katelyn Hill Drive  
West Falmouth, MA 02574

Stephen M. Scolnick, Esq.  
Law Offices of Russo &  
Scolnick, Eighth Floor  
Two Oliver Street  
Boston, MA 02109

Norfolk County Registry of Deeds  
Land Registration Office  
649 High Street  
Dedham, MA 02026

Equity One, Incorporated  
25 South River Road  
Bldg. #1, Unit 104  
Bedford, MA 03110

Watkinson Law Offices  
60 Quaker Lane  
Suite 62  
Warwick, RI 02886

Luxury Mortgage Corp.  
One Landmark Square  
Suite 100  
Stamford, CT 06901

Suffolk County Registry of Deeds  
24 New Chardon Street  
Boston, MA 02114

Barron & Stadfeld  
50 Staniford Street  
Suite 200  
Boston, MA 02114

Greenpoint Mortgage Funding, Inc.  
2300 Brookstone Center Parkway  
Columbus, OH 31309

Equity One, Incorporated  
200 Chauncy Street  
Mansfield, MA 02048

Equity One, Incorporated  
Attn: Rachel Knee  
301 Lippincott Drive  
Marlton, NJ 08053

City of Boston  
Assessing Department  
1 City Hall Plaza, Rm 302  
Boston, MA 02201

Quincy Tax Assessor's Office  
1345 Hancock Street  
Quincy, MA 02169

Brockton City Hall  
Assessor's Office  
45 School Street  
Brockton, MA 02301

Brad Bailey, Esquire  
Four Longfellow Place  
35<sup>th</sup> Floor  
Boston, MA 02114

Andrew Feldman  
Broadway Enterprise Inc.  
100 Water Street  
Worcester, MA 01604

Richard A. King  
Asian American Bank  
68 Harrison Avenue  
6<sup>th</sup> Floor  
Boston, MA 02111

by certified mail, postage prepaid and return receipt requested, or by serving such copies on the listed parties by hand.

You Are Further Commanded that pending further order of the Court, you are **not** to take possession of, seize, or otherwise take into custody the Defendant Properties identified above as 301 Adams, 1548 Dorchester, and 204 North Montello (the "Defendant Real Properties"), and you are **not** responsible for the care or maintenance of the Defendant Real Properties during the pendency of this forfeiture action.

You Are Further Commanded, if you are granted permission by the owners or possessors of the Defendant Real Properties, to enter and forthwith conduct an inventory and inspection thereof.

You Are Further Commanded to arrest, attach, inspect and retain the Seized Currency and the 9269 Account in your custody until further order of this Court.

You Are Further Commanded to give due notice by appropriate

service of process, as provided herein, to all persons who claim an interest in the Defendant Properties, or assert that the Defendant Properties should not be condemned or disposed of pursuant to the prayer of the Verified Complaint for Forfeiture In Rem. Upon execution of this process, you are directed further to file the execution in this Court with your return thereon.

ALL CLAIMS TO THE DEFENDANT PROPERTIES MUST BE FILED WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS AND SERVED UPON THE UNITED STATES ATTORNEY'S OFFICE, ASSET FORFEITURE UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210, WITHIN THIRTY (30) DAYS AFTER PROCESS HAS BEEN EXECUTED OR WITHIN SUCH ADDITIONAL TIME AS MAY BE ALLOWED BY THIS COURT. ALL ANSWERS TO THE COMPLAINT MUST BE FILED WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS AND SERVED UPON THE UNITED STATES ATTORNEY'S OFFICE, ASSET FORFEITURE UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210, WITHIN TWENTY (20) DAYS AFTER THE FILING OF THE CLAIM. CLAIMS MUST BE FILED IN ACCORDANCE WITH THE FEDERAL RULES OF CIVIL PROCEDURE, SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS. THE PROCEDURES FOR FILING A PETITION FOR REMISSION OR MITIGATION ARE SET FORTH IN 28 C.F.R. PART 9. IN ADDITION TO THE PROCEDURES MANDATED BY THOSE REGULATIONS, A COPY OF ANY PETITION FOR REMISSION OR MITIGATION

SHOULD BE FILED WITH THE SEIZING AGENCY, WHICH IS THE FEDERAL BUREAU OF INVESTIGATION, ONE CENTER PLAZA, SUITE 600, BOSTON, MASSACHUSETTS 02108, ATTENTION ASSET FORFEITURE GROUP.

Sarah A. Thornton, Clerk  
U.S. District Court

By: Lisa M. Howhan  
Deputy Clerk  
Date: 7/12/, 2005

APPROVED AND SO ORDERED:

Reginald C. Lindsay  
REGINALD C. LINDSAY  
United States District Judge  
Date: July 6, 2005



**U.S. Department of Justice**

***Michael J. Sullivan***  
***United States Attorney***  
***District of Massachusetts***

***Main Reception: (617) 748-3100***

***Kristina E. Barclay, Assistant U.S. Attorney***  
***John Joseph Moakley United States Courthouse***  
***1 Courthouse Way, Suite 9200***  
***Boston, Massachusetts 02210***

June 30, 2005

**FILED UNDER SEAL**

Lisa Hourihan  
Clerk to the Honorable  
Judge Reginald C. Lindsay  
United States District Court  
District of Massachusetts  
1 Courthouse Way  
Boston, MA 02210

Re: United States of America v. 301 Adams Street, Quincy, Massachusetts; 1548-1558 Dorchester Avenue, Dorchester, Massachusetts; and Five (5) Certain Parcels of Land with the Buildings(s) Thereon in Brockton Plymouth County, Massachusetts, Commonly Known as 11 Rosseter Street, 16 Rosseter Street, 213-223 North Main Street, 204 North Montello Street, and 227 North Main Street, Including All Appurtenances and Improvements Thereon; \$67,561.88 in United States Currency; and \$26,776.42 in United States Currency, Seized from Asian American Bank Checking Account Number 310029269  
Civil Action No. 04-12582-RCL

Dear Ms. Hourihan:


Enclosed for filing, please find a Warrant and Monition in connection with the above-referenced civil forfeiture action. This document, which gives the United States the authority to notice all interested parties of this forfeiture action, was not filed with the original Amended Complaint for Forfeiture in Rem, due to the sensitive materials filed with Complaint and the ongoing criminal investigation.



Lisa Hourihan  
June 30, 2005  
Page Two

Thank you for bringing this matter to the attention of the Court. Due to the fact that there is an ongoing criminal investigation and everything remains under seal, kindly call Lisa Talbot as soon as the Judge has made a ruling on this document. She can be reached at 617-748-3283.

Very truly yours,



Kristina E. Barclay  
Assistant U.S. Attorney

KEB/ljt  
Enclosures